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OF NEW YORK, INC.**

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November 6, 2023

BY ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Jeremy Joseph
23 Cr. 068 (JPO)**

Dear Judge Oetken:

I write as standby counsel for Jeremy Joseph in the above-captioned matter to file the enclosed opposition to DCVC's motion to quash, as written by Mr. Joseph.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

Standby counsel for Jeremy Joseph

cc: Jamie Bagliebter, Assistant U.S. Attorney
Benjamin Wagner, Counsel for DCVC

23 Cr 068

Response to DCVC's Motion to Quash Subpoena Duces Tecum

Written: 10/13/2023

Federal Rules of Criminal Procedure 17.2 or 17(c)(2) on motion made promptly, the court may quash or modify a subpoena duces tecum if compliance would be unreasonable or oppressive. The request party (DCVC) must demonstrate four elements, *United States vs. Caro*, 597 F.3d 608, 619 (4th Cir. 2010).

1) The party must demonstrate the requested documents are relevant. Defendant Jeremy James Joseph requests from DCVC a) HR Records for Jeremy Joseph (himself), Anna Fokina (coworker), John Hamer (Jeremy's former boss), Matt Ocko (Jeremy's former boss), Kiersten Stead (Jeremy's former boss), and Zach Bogue (Jeremy's former boss). Additional docs include DCVC's Zero Tolerance Harassment Policy and DCVC's Pledge to Diversity (signed by Jeremy's former bosses). Defendant believes these documents speak to defendant's character as well as provide key evidence that is critical to defendant's defense. Note that Jeremy and his mother, Stella Lucille Joseph, both became ill and criminal bad acts occurred to them both while Jeremy was an employee at DCVC and while both were proceeding with discrimination, retaliation, and harassment claims against DCVC.

In fact, the week after Stella Lucille Joseph brought defendant to California's DFEH office, she became ill only days later and rushed to the emergency room for internal bleeding in Houston, Texas. Weeks after that, a fire would occur in the defendant's home rendering him homeless. DCVC knowing that Jeremy was on medical leave and his mother was in the hospital, would then have Jeremy "resign" week after Jeremy's mother was diagnosed with uterine cancer. The HR Records and supporting documents are not oppressive or unreasonable, as they would provide the last official employment of defendant, a record of DCVC's actions in support or retaliation against the Josephs, and should be done as a normal course of business as HR records from defendant's previous employer Morgan Stanley were supplied upon weeks of being served a subpoena. Additionally, key witnesses may be called to testified who know of the ill-treatment by DCVC and how they may have a connection to the charges to the current case in NYC. These people are: Julie Grant (Canaan Partners), Ross Leimberg, Macromoltek Founder Team, Dino Goosens-Larsen. Boryana Straubel, a former Stanford GSB classmate and recently deceased, was aiding the defendant in his discrimination claims against DCVC before she unfortunately passed.

2) Second, the party must show that the documents are not otherwise obtainable in advance of trial through the exercise of due diligence. These records and documents are in DCVC's possession and are not public records.

3) Third, the production and inspection of the documents must be necessary in preparation for trial. The government's discovery includes references to DCVC and the defendants time period there. Defendants first criminal charge was while he was an employee at DCVC and defendant needs these documents to prepare for his defense. Evidence shows emails regarding DCVC and employees. Also defendant filled out a FBI intake (San Francisco) form flagging hacking activity

and illegal practices that he thought one of the prime suspects was Kiersten Stead (DCVC). Kiersten Stead prior to the defendant falling ill told him, “Be prepared to be alone for a long time” and “There’s enough of you and your kind in venture capital, and not enough of me.” Kiersten Stead’s comments also included derogatory remarks against gays (“Too many Peter Thiel’s in venture capital), blacks (use of the “N” word), Jewish people (references to stinginess), Asians and Arabs (“bad money), and more. She will be called to take the stand to share more of her colorful commentary and asked about her connection related to criminal charges against the defendant.

4) Fourth, the request for a subpoena and request is made in good faith. Defendant Jeremy Joseph makes his request in good faith as he did with Morgan Stanley, and that request was done without any conflict or delay.

Finally HR records are of former bosses who have much to gain by sabotaging my efforts to recover. Each time the defendant aimed to exercise his legal rights to file claims against DCVC, he was met with setbacks including sickness, mother’s death, and criminal charges. In fact, the defendant was scheduled to do a virtual intake with the DFEH against DCVC, and emails (including the ones in question) sabotaged those latest efforts.

Reference: Federal Rules of Evidence (Rule 406); Habit, Routine Practice. Evidence of a person’s habit or an organization’s routine practice may be admitted to prove that on a particular occasion the person or organization acted in accordance with the habit or routine practice. (Rule 405); Methods of proving character by reputation or opinion. By specific instances of conduct, *Michelson v. United States*, 335 U.S. 969, 69 S. Ct. 213, 93 L. Ed 168 (1998). An accused may introduce pertinent evidence of good character in which the prosecution may rebut with evidence of bad character. *See*, 9th Circuit 2021; U.S. Dist. LEXIS 114505 *Hadley v. City of Anaheim*, Michelle Suzanne Hadley, McLetchie Law, Santa Ana, CA. April 2021. CV 18-01831-DOC-KES. She spent 88 days in jail for false emails. Retaliation by her ex-fiancé.

See Attached Exhibit (Approx. 7 days): Theory: Organized Crime ...

JJJ

Signed Jeremy James Joseph /s/

Date: 10/13/2023

EXHIBIT A

Jeremy Joseph

PAGE #1
TOTAL:
8 PAGES

Theory:
Organized Crime:
white Supremacists + Probate Fraud
+ Identity Theft/Fraud + Premeditated Murder

Houston, Texas
Organized Crime
white Supremacists!
Monty Law

*2019 James Horwitz becomes a judge in probate court. He is criminal partners w/ Fred Dahn + Monty Law

Monty Law: criminal defense attorney for cousins William David Joseph and tried to probate Jeremy's mom's will into Horwitz court. Case is on appeal. Motions filed never heard. Criminal partners include:

Matt Harsh, Martina Cantwright, Stacy Ajaja, Wilhelmina Bell-Kandler, Dahere.

Horwitz + Monty explore how to defraud Monty + W. Joseph target Stella + Jeremy Joseph. S+J. Joseph had not seen William Joseph in 15 years. Non mena Bell. Mena Bell + Stacy Ajaja - Confession filed in probate court. Cause no. 491773. Probate court sued by Sherry Johnston.

*2019 Mom visits Jeremy in California for graduation. She is noticeably weaker + less mobile. From her phone contact list, Jeremy notices Wilhelmina's name in cell record. Jeremy is concerned as this woman has been toxic and involved in criminal matters plus mom had not spoken to her in 15 years. They agree to discuss later.

Jeremy visits mom in Houston for summer after graduation her condition okay. Thanksgiving weird - dementia strange.

Bay Area, California
Kirsten Stead + husband (Rhodesia, macromolten, racial slurs @ work) Ireland. Not American. ~~Macromolten~~ (Texas)

In 2020, Jeremy took disability leave from firm and Kirsten admitted to discrimination + harassment. "Too many of you in VC and not enough me." "Get ready to be alone for a long time." Similar abuse to Macromolten. See Jeremy's LinkedIn.

*2018 Jeremy joins Stanford ASB exec MPA program. Interviews for multiple places. Someone reaches out to Jeremy to interview for Dore (firm that has Kirsten). Jeremy selects Dore - diversity initiative + SF office. Spends Christmas w/ mom, Mexico City + Hawaii w/ Stanford ASB classmates for NFE.

Jan 2019, on way to JPMorgan conference car hydroplaner off highway. car decimated. mirror injuries. car wheels locked up. New Tires keep blowing out before this happened. Jeremy works @ Dore. workload starts manageable then gets worse and goes past contract. Jeremy flags concerns of Kirsten to Stanford ASB + Julie Grant @ Canaan.

Horwitz Public Corruption Complaint + demand letter filed

2018

2019

2019

Jeremy Joseph

PAGE #2

Theory:
Organized Crime:
White Supremacists + Probate Fraud
Identity Theft/Fraud + Premeditated Murder

23CR068

Houston, Texas

Bay Area, CA

[2019] Jeremy visits mom for Thanksgiving
She seems off. Not able to get a
firm answer from her on what is
going on. Dave is badgering Jeremy
on a deliverable that has no
urgent deadline. Not sure why
Kirsten is bothering Jeremy on
Thanksgiving holidays in Houston
about something that is not urgent
(investment memo for a Dave deal
that is only for internal purposes -
plus previous deals done by her
have unfinished memos.

[2020] Stacy Ajaja + Wayne Newman + Monica Law
+ more Bell: Medicare Fraud Investigation (DOJ)

Mom gets word Jeremy not
feeling well. They talk on
phone about discrimination,
racial abuse, etc. She aims
to get Jeremy to come to
Houston. He tries. His physical
condition is bad. He is on
medical leave in SF.

Mom starts to hear Jeremy
is being "hacked". Mother has
malware on Samsung phone.
Stanford alum on riprep
project (2021) confirms malware
on Stanford USB Google Drive and
on MacBook computer.

Someone files false tax returns for Jeremy Joseph
115K refund

[2019] Dave offers full time job
offer w/ perks and accelerated
promotion, mentorship, etc. Jeremy
worked so hard he can't
interview elsewhere. Once job
starts dynamics change drastically
never work w/ Kirsten -
don't want to work w/
her and no choice. Racial
slurs + excessive demands
start. Jeremy has no time
for friends, therapist, crossfit.
Complains to Bogana Strambel
Stanford classmate who agrees
to help. Bogana in 2020/2021
is killed in bike/car
accident. Allison House agreed
to help and his mother dies
and Jeremy never hears
follow-up. Jeremy confronts
Kirsten on discrimination +
harassment. She tries to
deny but affirms/confirmes.
Jeremy spent time in South
Africa - and had concerns
about Kirsten's language and
white supremacy racial slurs.

[2020] JPMorgan conference. Kirsten
continues abuse. Kirsten tells Jeremy
"Be prepared to be alone for a
long time."

Jeremy Joseph
PAUSE#3

Theory:
Organized Crime:
white Supremacists + Probate Fraud +
Identity Theft/Fraud + Premeditated Murder

Houston, TX

2020

Mom is in touch w/ Jeremy and hears he is hacked. once
Jeremy's phone number 713-899-8695 and primary email jjoseph082@gmail.com (has had for 20 years) are hacked and inaccessible the hacks activity decline.
Jeremy calls Stella from UC Berkeley campus - and she agrees to see him ASAP. Stella is aware that Jeremy is afraid of Dave. Kristen white Supremacist with connections to chapters are afraid of a lawsuit. Mom helps Jeremy file DFET claim. Kristen a John fired from Monsanto for unethical behavior. Burrill firm also under DOJ for illegal activity.
Mom decides to visit Jeremy in SF. Her health is deteriorating. Her final day in Jeremy's apt in SF she falls ill. Diarrhea all night. She goes to ER later in Houston.

Bay Area, California

2020 Jeremy on medical leave. Sends paperwork to Dave. Doctor confirms. Dave continues to not be helpful. Jeremy sends preliminary paperwork to Dave flagging discrimination + harassment. He is told by John Hanna that if he continues this - there will be less black people in VC. Jeremy falls into drug addiction - previously saw therapist who said his use was not addictive but recreational, but while @ Dave it becomes abusive. Jeremy also has accounts + computer "hacked" He brings devices to Fbi Oakland + SFPD but is told there is no cybercrime division. Floor above Jeremy's apt has constant noise @ night. Jeremy goes to apt to ask to be quiet - and the apt has no furniture. Just a group of 5-7 people walking around living room with laptops. Unable to get camera info. No doorman. No superintendent. Mail goes missing. Wells Fargo debit card has fraudulent charges. Medication in apt goes missing. Apt lock malfunctions (electronic)

2020

USA vs.

Jeremy Joseph
PAGE #4

Theory:
organized crime
white Supremacists + Probate Fraud
Identity Theft + Premeditated Murder

Houston, TX
↙

Bay Area, California
+

2020

COVID-19 begins
- shops & services begin to close...

[2020] Numerous issues in Apartment. Jeremy tells police report for id theft. Complaints with management regarding security. Tells Stanford he is being hacked and suspects DVC involvement. Dave never approves disability leave, both with California state and personal.

Mom returns to Houston. Goes to ER. Blood in her stool. Anemic. Jeremy rushes to Houston. IN hospital for a week. Dogs in doggie daycare. House is deteriorating. Jeremy agrees to return. Goal is to close up apt and get belongings for mom.



Mom visits Jeremy in SF then falls ill. Jeremy leaves SF to go to hospital. Only person who visits is Miss Jacobs. Jeremy falls ill upon return to apartment. When mother was in apartment - no hacking. Now it returns. Fire occurs and Jeremy is charged w/ arson. Review of events is w/ forensic psychiatrist. Sent to SF DA. 1st criminal offense. offered pretrial diversion + PR bond. Jeremy's wallet etc are in the apt. with COVID-19, he is homeless. Mom tells Jeremy to come to Houston. He goes to Houston.



Jeremy returns to Houston. Doctors can't confirm her(mom's) health problems. Bronchitis + internal bleeding + anemia.

88 USA
vs

Jeremy Joseph
PAGE #5

4:23-cr-104

23 Cr 068

Theory: organized crime
white supremacists + Prohibit Fraud
ID Theft / Fraud + premeditated Murder

2020: Houston, Texas

2020 1 - May

Jeremy becomes mother's primary caregiver. Her health gets worse for no apparent reason. Jeremy forces her to stop working and to live at home. The pets back in doggy daycare. Jeremy calls public defender in SF and continues to call the district division (always goes to voicemail). COVID19 closes businesses. Help for both mom & self is hard with travel bans + store closings. House is in disarray. Jeremy applies to luxury condo near medical center. Aimee to transfer mom to MD Anderson. William Joseph + Mena enter (never saw in hospital or spoke to). They enter home. Valuables go missing. Money (cash) disappears. Mom's items go too. Jeremy stops by Houston PD to check if he has warrant - he does not. One week later - his 8th time on his alma mater Rice University - white officer charges him w/ trespassing. Warrant is found. 3rd location later. 4th search later 2 hours later - they find Cocaine. Arresting officer lied when he said he couldn't find Jeremy's name in database. Mom had emailed Alumni office for help. Matt Horak court appointed. Tried to fire. Refused to help w/ bail. Kept Jeremy in jail for 4 months. Mom poisoned and killed during period (Elliott/Chen/Ho doc) by Mena (cousin). New will written by Mena/William/Mona/Mena. Money in all accounts drawn out. Cousins have 20yr criminal + financial ruin history. Cousin is in jail. Tells Jeremy about mom's life insurance policy. Jeremy released from jail. Cousins are in house. 1st Cousin hits Jeremy and leaves Jeremy alone w/ mom. No nurse. House bad. Mom soiled in feces. 250 lbs. Hair out. Death. No Meds.

4:23-cr-104 -

23 Cr068

USA
vs.
Jeremy Joseph
PAC#6

Theory: Organized Crime
White Supremacists + Probate Fraud
+ Premeditated Murder

2020: Houston, Texas

2020 / NOVEMBER

2nd cousin returns next day. Pushes Jeremy. Mom gets Jeremy \$2K to get things in order. Phone lines are cut. Mom looks like she is about to die. No car. Cousin refuses to call 911 or bring Mom to ER. Jeremy begs. Cousin refuses. Attraction. Cousin records Jeremy. Then holds a gun to kill Jeremy. Jeremy deposited \$25K into joint account w/ mom. All gone. accounts closed. Held together for 115 years. Jeremy files (warrant + threat of death). Files police report later. Spends 2 weeks in domestic violence shelter. ATF. Valdesha De Jean. Betterhelps mom is sent to ER a week later from a stroke. Dies 1.5 months later. Kristin Jackson. All in CASE NO 491773. Harris County Probate. Later.

2021

? mom dies Jan 3, 2021.

? Jeremy unable to get into home. Discovers Medicare fraud (hospice), fake will (James Hamitz), opened credit cards in both names. Stacey Ajaya

Cousin in July 2020 cashes out Jeremy's car insurance and told them Mom was going to die. Not true. Not a terminal cancer. Given chemo a month later. Connection from months to Kristin + Husband? Ireland white Supremacists. Both go to Ireland quite a bit.

? Jeremy discovers after he files a police report against cousins they had filed one against him months ago. Boyan Miller prohibits from recommending Fred Dana. Jeremy realizes after \$60,000 spent on lawyers they are working together. Can never get police videos of crimes.

? Jeremy hires lawyers Preston + Summit Defense for warrant in California + to get cocaine plea bargain appealed overturned. They never help.

89
WST vs

Jeremy

Joseph

PAGE #7

Theory:

organized crime
white Supremacists + Probate Fraud
ID Theft/Fraud + Premeditated Murder

2021
Houston, TX

+

[2021]

> Jeremy files police reports, IRS fraud affidavits, FTC, Medicare fraud w/ Kelsey Seybold

> Jeremy discovers fake will. Lawyers colluding. James Horvitz + Clarinda Constock in court w. Lawyers: Dahn, Cartwright, Hector Garza (DA) his mom is clerk in my criminal court and he's aunt notarized my mom's fake will doc and works for Nevada + Marks + w/ Mena C Houston Methodist. Stacey Ajaja has advised mom on hospice care. Jeremy has copy of wills and important docs but Roger Miller + judge ignores.

Highlight

*Jeremy goes to rehab!

[2022:] Jeremy fires lawyers. Pro SE. Lisa Pyle advises on criminal. Stanford alum on upware notices devices and shared drives has signs of malware. Mark Hansen advises on probate.

Jeremy files consumer complaint w/ Harris County DA against lawyers. Files public corruption complaint against James Horvitz, serve demand letters to Horvitz.

> Sherry Johnston - another victim. Texas.

'Appeal his Summary

> 1 year sober in Sept 2022. tries to do intake w/ FBI. Judgment tells him to talk to a lawyer.

> Monda Law firm tries to probate fake will. ALSO represent William in

ID theft continues. William has a felony indictment of theft > \$15K from Sept 2021. Communications w/ him in Cause 441773. He objects to interrogatories I send to him via Christensen. I tell courts I think mom killed.

USA vs
Jeremy
Joseph

PAGE #8

Theory: Organized Crime
white Supremacists + Probate Fraud
ID Theft/Fraud + premeditated Murder

23Cr68

THEATRICAL

Houston, TX

2022

- > Cousins assault charge + warrant conditions keep me in Houston. I try to get them relaxed to go back to SF but lawyers refuse to put in request.
- > DVC owes me backpay. They refuse to send check. They send check only when Christiansen files motion for sanctions in probate court. He is trying to get backpay. Christiansen also ignores requests including certified letter to stop the creating ID Theft/Fraud.
- NOTE: No one will allow me into home I shared w mom for 30 years. original will in trav. Theory: cousins go through (w lawyers) all paperwork, journals, medical records. Have evidence in storage unit.
- we need James Horwitz emails. He refuses to provide transcripts, emails, video of proceedings, etc. He wouldn't help when I flagged ID Theft/murder (certified email/letters). warrant for my arrest kicks up
- Learn James Horwitz files police charges when my California charge is almost dismissed.
- > Start to get poisoned/ser of least notice poisoning. Doc visits (ATF Del's)
- En visits at Memorial Hermann NW (Houston). Found malware on mailbox. Reported ID Theft to Norton Lifeline policy.
- > Go to DC. to get help. Poisoned there. fly from Boston?
- CANADA
- 2022 - free to Canada. windson: file refugee claim. Followed to Canada.
- En visit in Windsor, File police report. I see roommate's clothes, bed, shoes and floor w solvent
- Send photos of injury to Sarah Soule @ Stanford. Now will I send to Michael Devitt. If I die, Cousins would get everything. Now ATF does, upon my death (untimely) this document can be made public and given to FBI/DOJ
- For incapacitated.
- > Emails in Canada (us create new charges. I waive extradition)

Jeremy Joseph

Why I signed waiver of Extradition 230068

- ° Mother was murdered and needed to see someone on the U.S. actually do something about. In the Canadian news, and I've still not heard word about where that investigation is.
- ° U.S. DOJ was interfering with my refugee application process. Immigration had confirmed by conversion from refugee claimant to refugee but upon the extradition proceedings and DOJ intervention that status never converted. Officer Manique Desabrais verbally confirmed by "EOD you will be classified as a refugee." Never happened though and I suspected foul play. Asst. Attorney General K. Aird was unresponsive and unprofessional, and ultimately replaced due to incompetence. See transcripts and zoom recordings.
- ° Criminal proceedings regarding attacking threat were being compromised. I was ready for trial - and it appeared as if Chief Prosecutor and/or someone not directly involved w/ the case was trying to sabotage my efforts. See transcripts and zoom recordings. Canadian evidence can be exchanged through a legal attache acting as an intermediary. Expeditional. NOTE: Original email with full images loaded + other critical discovery / disclosure was never actually provided despite multiple requests. The delay and then stay were just tactics to avoid embarrassment as my case had been in the news. Similar crimes happened in the region including an attack on the PM months later from after my arrest. No real investigation was done. ALSO to delay time. Crown was going to bring up a Prior Discreditable Conduct Application and only get 2 people onboard - MTC?
- ° The charges are bogus from the U.S. Especially the ones I was extradited on. It may be possible there is another investigation regarding my mother's murder and attempted murder on me. I had filed a police report in Windsor, Ontario and visited the CN after being poisoned w/ a corrosive acid solution. Sad but I wanted to show how lies and bogus charges can be used illegally - and how the US and Canada erect in its judgement to extradite me. My life was still in danger in Canada. Refugee protection was not possible.